

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN GACHAGO,
Plaintiff

v

BRISTOL MYERS SQUIBB, and
AMERICAN EXPRESS,
Defendants

CLERK'S OFFICE
2005 MAY 12 P 1:52
CIVIL ACTION NO.
05-10141-RGS

**JOINT SCHEDULING STATEMENT OF THE PARTIES PURSUANT TO LOCAL
RULE 16.1(D)**

Pursuant to Local Rule 16.1(D), the parties submit this joint statement in advance of the initial scheduling conference scheduled for May 18, 2005.

I. PROPOSED SCHEDULE FOR DISCOVERY AND FILING MOTIONS

Motions to Amend Pleadings Filed by	May 20, 2005
Oppositions to Motions to Amend Filed by	June 3, 2005
Initial Disclosures Exchanged on or Before	June 16, 2005
Start of Fact Discovery	August 16, 2005
Expert Disclosures Exchanged on or Before	October 14, 2005
Rebuttal Expert Disclosures Exchanged on or Before	November 15, 2005
Discovery Completed by	January 12, 2006
Motions for Summary Judgment Filed by	February 16, 2005

II. CERTIFICATIONS

The required certifications from counsel and the parties that they have conferred with respect to budgetary concerns and possible resolution through alternative dispute resolution programs such as those outlined in Local Rule 16.4 will be filed separately by the parties.